

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
McMANIMON, SCOTLAND & BAUMANN, LLC 75 Livingston Avenue, Suite 201 Roseland, NJ 07068 (973) 622-1800 Anthony Sodono III (asodono@msbnj.com) Sari B. Placona (splacona@msbnj.com) <i>Counsel to Daryl Fred Heller</i> <i>Chapter 11 Debtor and Debtor-in-Possession</i>	
In re:	Case No. 25-11354 (JNP)
DARYL FRED HELLER,	Chapter 11
Debtor.	

CERTIFICATION OF SARI B. PLACONA, ESQ. IN SUPPORT OF DEBTOR’S APPLICATION TO EXPEDITE RETURN DATE OF (I) MOTION FOR AN ORDER APPROVING THE AGREEMENT AMONGST THE DEBTOR, HELLER CAPITAL GROUP, LLC, HELLER INVESTMENT HOLDINGS, LLC, AND DEERFIELD CAPITAL, LLC PURSUANT TO 9019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE, AND (II) MOTION FOR AN ORDER APPROVING THE AGREEMENT BETWEEN THE DEBTOR, CHARLENE R. HELLER, AND ORRSTOWN BANK PURSUANT TO 9019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE

SARI B. PLACONA, Esq. of full age, hereby certifies as follows:

1. I am an attorney duly admitted to practice law in the courts of the State of New Jersey and the District of New Jersey.
2. I am a Partner in the law firm McManimon, Scotland & Baumann, LLC, counsel to Daryl Fred Heller, the Chapter 11 Debtor and Debtor-in-Possession (the “Debtor”), in the above captioned matter.
3. I submit this Certification in Support of the Debtor’s Application to Expedite Return Date of (I) Motion for an Order Approving the Agreement Amongst the Debtor, Heller Capital Group, LLC, Heller Investment Holdings, LLC, and Deerfield Capital, LLC

Pursuant to 9019 of the Federal Rules of Bankruptcy Procedure [ECF 258] (the “Deerfield 9019 Motion”), and (II) Motion for an Order Approving the Agreement Between the Debtor, Charlene R. Heller, and Orrstown Bank Pursuant to 9019 of the Federal Rules of Bankruptcy Procedure [ECF 213] (the “Orrstown 9019 Motion”).

4. The Deerfield 9019 Motion and Orrstown 9019 Motion are returnable before the Court on August 13, 2025.

5. On July 1, 2025, Prestige¹ withdrew its Motion for the Appointment of Chapter 11 Trustee and to Modify Examiner’s Order (“Prestige Trustee Motion”). ECF 265. The Prestige Trustee Motion was the only issue preventing the Deerfield 9019 Motion and the Orrstown 9019 Motion from proceeding earlier – originally returnable June 10, 2025. Now that the Prestige Trustee Motion has been withdrawn, the Debtor respectfully requests that the Deerfield 9019 Motion and the Orrstown 9019 Motion move forward on an expedited basis and be heard earlier than August 13, 2025.

6. The Debtor proposes the Deerfield 9019 Motion and the Orrstown 9019 Motion be scheduled for July 21, 2025, or that week, or a date soon thereafter, whichever is more convenient for the Court.

I certify under penalty of perjury that the foregoing is true and correct.

/s/ Sari B. Placona
Sari B. Placona

Dated: July 3, 2025

¹ Prestige Fund A, LLC, Prestige Fund A IV, LLC, Prestige Fund A IX, LLC, Prestige Fund B, LLC, Prestige Fund B II, LLC, Prestige Fund B IV, LLC, Prestige Fund B V, LLC, Prestige Fund B VI, LLC, Prestige Fund B VII, LLC, Prestige Fund B BTM I, LLC, Prestige Fund A II, LLC, Prestige Fund A V, LLC, Prestige Fund A VI, LLC, Prestige Fund A VII, LLC, Prestige Fund D, LLC, Prestige Fund D III, LLC, Prestige Fund D IV, LLC, Prestige Fund D V, LLC, Prestige Fund D VI, LLC, Prestige Fund D BTM I, LLC, WF Velocity I, LLC, WF Velocity Fund IV, LLC, WF Velocity Fund V, LLC, WF Velocity Fund VI, LLC and WF Velocity Fund VII, LLC (collectively, “Prestige”).